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U.S. EPA

CERCLA SECTION 104(e)

INFORMATION REQUEST

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FEB 27 2009

Environmental
Cleanup Office

FEB 28 2009

Please note: This Information Request includes instructions for responding to this request and definitions of words such as "Respondent," "Property," "Material," "Identify," and "Investigation Area" used in the questions. Please provide responses to all the questions in this Information Request for each Property identified in response to Question 4 of Section 2.0, when appropriate. You must answer the Questions in this Information Request related to properties or facilities outside the Investigation Area if Question 4, Section 2.0 specifically instructs you to do so. For each response clearly identify the Property or Properties to which the response applies.

INFORMATION REQUEST QUESTIONS

Section 1.0 Respondent Information

1. Provide the full legal, registered name and mailing address of Respondent.

Edgar S. (Ted) McCall
5480 NW Front Avenue
Portland, OR 97210

2. For each person answering these questions on behalf of Respondent, provide:

- a. Edgar S. McCall
- b. V.P.
- c. 5480 NW Front Ave. Portland Oregon, 97210
- d. 503 221-5880 ext. 4 , ted@mccalloil.com, fax: 503 221-5882
- e. Ron Brown- Operations Manager
- f. 5480 NW Front Ave. Portland Oregon, 97210, 503 221-6400
- g. , Ron@mccalloil.com, fax: 503 221-6414
- h. Robert H. McCall
- i. Chairman of the Board
- j. 5480 NW Front Ave. Portland Oregon, 97210
- k. 503 221-5880 ext. 3 , bob@mccalloil.com, fax: 503 221-5882
- l. Ned McCall
- m. Manager of McCall Properties, LLC

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- n. 5480 NW Front Ave. Portland Oregon, 97210
 - o. 503 221-5880 ext. 2 , ned@mccalloil.com, fax: 503 221-5882
 - p. Sepa Lipscome
 - q. Accounting
 - r. 5480 NW Front Ave, Portland Oregon, 97210
 - s. 503 221-6400, sepa@mccalloil.com, fax: 503 221-6414
 - t. Jim Charrierer
 - u. President
 - v. 5480 NW Front Ave. Portland Oregon, 97210, 503 221-6400
 - w. , jim@mccalloil.com, fax: 503 221-6414
 - x. Carol Humes
 - y. Marketing Specialist
 - z. 5480 NW Front Ave. Portland Oregon, 97210, 503 221-6400
 - aa. , carol@mccalloil.com, fax: 503 221-6414
 - bb. John Edwards
 - cc. John Renda
 - dd. Anchor Environmental, LLC
 - ee. 6650 SW Redwood Lane, Ste 333
 - ff. Portland, Oregon 97224 tel. 503 670-1108, fax. 503 670-1108
 - gg. Suzanne Lacampagne
 - hh. Partner Miller Nash LLP
 - ii. 111 SW Fifth Ave. Portland, OR 98204 503 205-2448,
Suzanne.Lacampagne@millernash.com, 503 224-0155
 - jj. Jeffrey Keeney
 - kk. Partner, Tonkon Torp, LLP
 - ll. 888 SW Fifth Avenue, Portland, OR 97204 503 802-2025, jeffk@tonkon.com,
fax: 503 972-3725
 - mm. business address; and
 - nn. business telephone number, electronic mail address, and FAX machine number.
3. If Respondent wishes to designate an individual for all future correspondence concerning this Site, please indicate here by providing that individual's name, address, telephone number, fax number, and, if available, electronic mail address.

Edgar S. McCall- 5480 NW Front Ave., Portland, OR 97210 503 221-5880 ext. 4, fax: 503 221-5882, ted@mccalloil.com

Section 2.0 Owner/Operator Information

4. Identify each and every Property that Respondent currently owns, leases, operates on, or otherwise is affiliated or historically has owned, leased, operated on, or otherwise been affiliated with within the Investigation Area during the period of investigation (1937 – Present). Please note that this question includes any aquatic lands owned or leased by Respondent.

5480-5724 NW Front Avenue, Portland Oregon 97210

In responding to this question, McCall Oil and Chemical can only provide information related to its own operations, and not related to the operations of its tenants, in particular, Great Western Chemical Company. GWC Front LLC leased property on tax lot 1000 to Great Western Chemical Company, a privately held chemical distributor, from approximately 1985 to July 2001. On July 3, 2001, Great Western Chemical filed for bankruptcy and soon after, stopped operating on the site. Quadra Chemicals Inc. later bought Great Western's business, including the business that operated on GWC Front LLC's property. Quadra sold the business to Brenntag Pacific in 2006. We understand that Brenntag is responding to Quadra Chemical's 104(e) request for Quadra's operations during their time of occupancy and operation at the GWC Front, LLC address. On the same property separate building Newco, Inc a Washington corporation doing business as High Purity Products entered into a lease with GWC Front, LLC in July 2001. High Purity Products distributes high purity chemistry to the electronics industry in Portland, Oregon. Their mailing address is 5740 NW Front Ave, Portland, OR 97201.

To the best of our knowledge, GWC Properties, L.L.C., as landlord to prior tenant Great Western Chemical, does not have any documents related to environmental or health and safety issues for Great Western Chemical's operations on the GWC Front, LLC site. After the bankruptcy of Great Western Chemical, all documents pertaining to this entity were under the control of the bankruptcy proceedings. For further information about the operations of Quadra or Brenntag, please refer to Brenntag's and Newco's 104(e) response.

McCall Oil and Chemical entered into a lease with the Port of Portland around 1973 on tax lot 1300 and build a marine terminal and has operated on this parcel to date. See Confidential Business Information for Purchase and Sale Agreement details. In 1982 MOREC Front, LLC purchased a asphalt plant from Douglas Oil and continues to own and operate the facility at the present time. GWC Properties, LLC purchased tax lot 1000 in 1984 and leased the facility to Great Western Chemical Corporation of Washington.

5. Provide a brief summary of Respondent's relationship to each Property listed in response to Question 4 above, including the address, Multnomah County Alternative Tax lot Identification number(s), dates of acquisition, period of ownership, lease, operation, or affiliation, and a brief overview of Respondent's activities at the Properties identified.

The following information obtained from Portlandmaps.com and the November 2000 McCall Oil and Chemical Corporation Focused Remedial Investigation

Workplan.

Tanker Basin LLC

5480 NW Front, Portland, OR 97210

Tax Lot: 1300

Multnomah County Alt Account # R941180260

Dates of Acquisition: 2004

Period of ownership, lease, operation, or affiliation: 1982 to Present

Overview of Activities: Marine Terminal

Morec Front LLC

5700 NW Front Ave, Portland, OR 97210

Tax Lot: 100

Multnomah County Alt Account # R941190960

Dates of Acquisition: 1982

Period of ownership, lease, operation, or affiliation: 1982 to Present

Overview of Activities: Asphalt Plant

GWC Front LLC

5540-5724 NW Front Ave, Portland, OR 97210

Tax Lot: 1000

Multnomah County Alt Account # R941180170

Dates of Acquisition: 1982

Period of ownership, lease, operation, or affiliation: 1982 to Present

Overview of Activities: Chemical distribution facility

In responding to this question, McCall Oil and Chemical can only provide information related to its own operations, and not related to the operations of its tenants, in particular, Great Western Chemical Company. GWC Front LLC leased property on tax lot 1000 to Great Western Chemical Company, a privately held chemical distributor, from approximately 1985 to July 2001. On July 3, 2001, Great Western Chemical filed for bankruptcy and soon after, stopped operating on the site. Quadra Chemicals Inc. later bought Great Western's business, including the business that operated on GWC Front LLC's property. Quadra sold the business to Brenntag Pacific in 2006. We understand that Brenntag is responding to Quadra Chemical's 104(e) request for Quadra's

operations during their time of occupancy and operation at the GWC Front, LLC address.

To the best of our knowledge, GWC Properties, LLC, as landlord to prior tenant Great Western Chemical, does not have any documents related to environmental or health and safety issues for Great Western Chemical's operations on the GWC Front, LLC site. After the bankruptcy of Great Western Chemical, all documents pertaining to this entity were under the control of the bankruptcy proceedings. For further information about the operations of Quadra or Brenntag, please refer to Brenntag's and Newco's 104(e) response.

6. Identify any persons who concurrently with you exercises or exercised actual control or who held significant authority to control activities at each Property, including:

McCall Oil and Chemical Operations: Tax Lots: 1300, 100. Mult. County Alt Account # R941180260 and R941130960.

Plant Managers: Ray Versosa, Gary Powell, Bernard Fisher, Vance Stasna, Dave Bauhger, Ronald Brown

Executive Management: Chuck Camble, Frank Moore, Jim Charrierer, Robert H. McCall, W.C. McCall,

Great Western Chemical Corporation: Tax Lot 1000, Mult. County Alt. Account R941180170

Executive and local management: Lee Zimmerli, Don Aultman, Marc Jensen, Robert H. McCall, W.C. McCall (diseased)

Great Western Chemical Corporation, Brenntag Pacific, Quadra Chemicals are all chemical distributors with rail access, bulk terminal, dry storage, drumming facilities and a laboratory services.

Newco, Inc a high purity electronics distributor.

In responding to this question, McCall Oil and Chemical can only provide information related to its own operations, and not related to the operations of its tenants, in particular, Great Western Chemical Company. GWC Front LLC leased property on tax lot 1000 to Great Western Chemical Company, a privately held chemical distributor, from approximately 1985 to July 2001. On July 3, 2001, Great Western Chemical filed for bankruptcy and soon after, stopped operating on the site. Quadra Chemicals Inc. later bought Great Western's business, including the business that operated on GWC Front LLC's property. Quadra sold the business to Brenntag Pacific in 2006. We understand that Brenntag is responding to Quadra Chemical's 104(e) request for Quadra's operations during their time of occupancy and operation at the GWC Front, LLC address. Newco, Inc also bought the business and inventory from Great Western Chemical.

To the best of our knowledge, GWC Properties, LLC, as landlord to prior tenant Great Western Chemical, does not have any documents related to environmental or health and safety issues for Great Western Chemical's operations on the GWC Front, LLC site. After the bankruptcy of Great Western Chemical, all documents pertaining to this entity were under the control of the bankruptcy proceedings. For further information about the operations of Quadra or Brenntag, please refer to Brenntag's and Newco's 104(e) response.

- a. partners or joint venturers; none
 - b. any contractor, subcontractor, or licensor that exercised control over any materials handling, storage, or disposal activity on the Property; (service contractors, remediation contractors, management and operator contractors, licensor providing technical support to licensed activities); Chicago Bridge and Iron and GATX built the marine terminal tanks.
 - c. any person subleasing land, equipment or space on the Property; Crown Zellerback 250,000 (Chicago Bridge and Iron built tank) and Boise Cascade 250,000 (GATX built this tank) both tanks were built in 1974 and sold back to McCall Oil in 1983. These tanks currently exist on tax lot 1300.
 - d. utilities, pipelines, railroads and any other person with activities and/or easements regarding the Property; See Appendix D for easement documents.
 - e. major financiers and lenders; Well Fargo Bank, Account Manager: Jim Bednark McCall Oil and Chemical operates with a line of credit. McCall Oil has no longer term debt at the present time. McCall Enterprise has no debt.
 - f. any person who exercised actual control over any activities or operations on the Property; See names above.
 - g. any person who held significant authority to control any activities or operations on the Property; See names above
 - h. any person who had a significant presence or who conducted significant activities at the Property; and See names above
7. any government entities that had proprietary (as opposed to regulatory) interest or involvement with regard to the activity on the Property. None Identify and describe any legal or equitable interest that you now have, or previously had in each Property. Include information regarding the nature of such interest; when, how, and from whom such interest was obtained; and when, how, and to whom such interest was conveyed, if applicable. In addition, submit copies of all instruments evidencing the acquisition or conveyance of such interest (e.g., deeds, leases, purchase and sale agreements, partnership agreements, etc.).

See response to question number 4.

8. If you are the current owner and/or current operator, did you acquire or operate the Property or any portion of the Property after the disposal or placement of hazardous substances, waste, or materials on, or at the Property? Describe all of the facts on which you base the answer to this question.

Given the industrial nature of the area, and the use of the site by previous occupants, there is a potential that contamination was present at the time the property was acquired, but no environmental data was collected prior to McCall's purchase of the property.

9. At the time you acquired or operated the Property, did you know or have reason to know that any hazardous substance, waste, or material was disposed of on, or at the

Property? Describe all investigations of the Property you undertook prior to acquiring the Property and all of the facts on which you base the answer to this question.

MOREC, Front LLC and GWC Front, LLC did not have any reason to believe such activities took place at these two properties prior to and closing of the property. See Appendix B: July 2004 Draft Remedial Investigation Report (Volumes 1 and 2) for further information on Flintkote and Great Western Chemicals historical summary. When Tanker Basin, LLC purchased the property from the Port of Portland (see Confidential Business Information Appendix for further details) McCall Oil was completing a Draft RI for Oregon DEQ's comments. See Appendix B: July 2004 Draft Remedial Investigation Report (Volumes 1 and 2).

10. Identify all prior owners that you are aware of for each Property identified in Response to Question 4 above. For each prior owner, further identify if known, and provide copies of any documents you may have regarding:
 - a. the dates of ownership;
 - b. all evidence showing that they controlled access to the Property; and
 - c. all evidence that a hazardous substance, pollutant, or contaminant, was released or threatened to be released at the Property during the period that they owned the Property.

The following information is from the November 2000 McCall Oil and Chemical Corporation Focused Remedial Investigation Workplan in combination with assessor's map

Tax Lot: 1300

Before 1966, most of this lot was submerged beneath the Willamette River. The Port of Portland created new land along the Willamette during the mid 1960s by dredging and filling along the shore. This land was deeded to the Port by the state of Oregon in 1967. In the mid-1970s, McCall Oil and Chemical constructed the Marine Terminal.

Tax Lot 100 & 1000:

In the mid-1920s, the Port purchased the property now occupied by McCall as part of an approximately 65-acre parcel that stretched from the lands owned by Union Oil Company of California (Unocal) on the west, to the Willamette River. Prior to the mid-1940s the property was vacant. In 1946, Pioneer Flintkote

Company (Flintkote) purchased two parcels from the Port, corresponding generally to present site tax lots 1000 and 100. These tax lots are currently occupied by Brenntag and the McCall asphalt plant, respectively.

Flintkote manufactured asphalt roofing shingles and tiles on the property from 1947 to approximately 1982. A factory, a warehouse for roofing material, silos, boilers, aboveground and underground storage tanks (ASTs and USTs, respectively), and retorts were situated on tax lot 1000. Historical occupation records indicate that Standard Oil Company operated a distribution center at the address corresponding to adjacent tax lot 100 during the 1950s (SAFE, 1994). By 1960, Douglas Oil Company (Douglas) occupied this address, and operated an asphalt facility. In 1962, Douglas purchased tax lot 100 from Flintkote. Douglas and Flintkote continued to operate their respective facilities until 1982, when both parcels and the improvements were sold to McCall. Erro Enterprises (Erro), a McCall family subsidiary, purchased the asphalt facility from MOCC in 1982 and operated the facility until 1992, when it was sold back to McCall. GWC Properties, Inc., now owns tax lot 17.

11. Chemax began operations on the former Flintkote site in early 1984. The Portland branch began its on-site operations in late 1985. In 1985, McCall operated a lube oil distribution facility on part of the asphalt plant site. The lube oil operations were discontinued in 1991. Identify all prior operators of the Property, including lessors, you are aware of for each Property identified in response to Question 4 above. For each such operator, further identify if known, and provide copies of any documents you may have regarding:
 - a. the dates of operation;
 - b. the nature of prior operations at the Property;
 - c. all evidence that they controlled access to the Property; and
 - d. all evidence that a hazardous substance, pollutant, or contaminant was released or threatened to be released at or from the Property during the period that they were operating the Property.

See #10 above

12. If not included in response to any of the previous questions, please describe the purpose and duration of each aquatic lands lease Respondent or the operator of Respondent's Property(ies) ever obtained from the State of Oregon and provide a copy of each application for and aquatic lands lease obtained.

See Appendix D: Tab Number 13.

Section 3.0 Description of Each Property

13. Provide the following information about each Property identified in response to Question 4:
- a. property boundaries, including a written legal description;
Site maps and legal descriptions are in Appendix A
 - b. location of underground utilities (telephone, electrical, sewer, water main, etc.);
Available site utility maps are in Appendix A
 - c. location of all underground pipelines whether or not owned, controlled or operated by you;
Available site utility maps are in Appendix A
 - d. surface structures (e.g., buildings, tanks, pipelines, etc.);
Site surface structures are shown in the Figure 2-4 of the November 2000 McCall Oil and Chemical Corporation Focused Remedial Investigation Workplan (see Appendix B)
 - e. over-water structures (e.g., piers, docks, cranes, etc.);
Site over-water structures are shown in the Figure 2-4 of the November 2000 McCall Oil and Chemical Corporation Focused Remedial Investigation Workplan (see Appendix B)
 - f. dry wells;
There are no drywells on the above mentioned properties.
 - g. treatment or control devices (e.g., surface water, air, groundwater, Resource Conservation and Recovery Act (RCRA), Transfer, Storage, or Disposal (TSD), etc.);
Site stormwater is treated by an on-site oil/water separator. Storm water is collected in the sumps located beneath the loading racks. In addition there is a sump located in the parking lot which remains closed at all times. Liquids from this sump are discharged into the API oil/water separator while being monitored by an operator. This separator was expanded to hold about three times more water in 1996. If contamination is present in the sumps, the petroleum liquids will be pumped into an above-ground storage tank (Tank #11-12) for processing at a later time or sent to an offsite recycler (e.g., Oil Rerefining/Thermo Fluids). At times, storm water is collected in two slop or storm water tanks. The oil and water are allowed to separate by gravity in the tanks. The water is discharged into the Willamette River per McCall Oil's NPDS permit. The oil recovered from the four-cell separation process is removed from the subject site by a used oil reclamation facility. The oil recovered from the four-cell separation process is removed from the subject site by a used oil reclamation facility. The new four-cell system has a holding capacity over four times larger than the old system that operated prior to 1998.

Water is drained out of the slop tanks manually by an operator. The discharge of water into a drain that leads to the API oil/ water separator is monitored continuously. When the water starts to change color, indicating that the tank level is at the oil/water interface, the discharge operation is shut down.

Vapor Combustion for Petroleum Fumes. The vapor combustion system (VCS) was installed in December of 1999. The VCS consists of a riser stack with internal gas riser; special anti-flash burner, automatic ignition pilot, safety control valve, detonation arrestor, blower, piping, and a master control panel. Typically, until loading occurs at the rack, the VCS is in standby mode. Automatic startup of the system is initiated by an electrical signal from the loading rack just before loading begins. The VCS is used to combust vapors during loading. There is no expected significant potential for oil releases to onsite soils, groundwater, or surface water from this equipment.

Treatment, Boiler blow down water, Meta Bi-sulfite Added to lower ph before discharge to river,

Asphalt Loading Rack, Monsanto Mist Eliminator

Treatment, boiler blow down water, Meta Bi-sulfite added to lower ph before discharge to river, surface water is discharged through our API Oil Water Separator. Air, Diesel Rack, Bottowm loading, vapors collected and discharged through John Sink Incinerator. Asphalt loading rack Monsanto Mist Eliminator.

- h. groundwater wells, including drilling logs;
Monitoring well and soil boring locations are shown in Figure 2 of the July 2004 Draft Remedial Investigation Report. Boring and well logs are in Appendix B of the same report (see Appendix B of the submittal for a copy of the report)
- i. storm water drainage system, and sanitary sewer system, past and present, including septic tank(s) and where, when and how such systems are emptied and maintained;
Site stormwater drainage is shown in the McCall and Brenntag Stormwater Pollution Control Plans See Appendix C: Storm Water Pollution Control Plan.
- j. subsurface disposal field(s), Underground Injection Control (UIC) wells, and other underground structures (e.g., underground storage tanks (USTs); and where they are located, if they are still used, and how they were closed;
No subsurface disposal fields or UIC wells are known to be present or to have been present in the past. A gasoline UST decommissioned by Hahn and Associates in 1989 (formerly located at the south end of the Great Western Chemical Warehouse). In January 1990, DEQ issued a "No Further Action" letter for the UST. A copy of the UST decommissioning report is in Appendix G of the November 2000 McCall Oil and Chemical Focused Remedial Investigation (see Appendix B of this Report)
- k. any and all major additions, demolitions or changes on, under or about the Property, its physical structures or to the property itself (e.g., stormwater drainage, excavation work); and any planned additions, demolitions or other changes to the Property;

McCall Oil and Chemical Corporation:

The separator was expanded from 1 bay to 4 bays , to hold about three times more water in 1996. 2004 coalescing plates were added to each bay. Acid Tank and containment area built in 2005.2006 Marine terminal rack upgrade for Bio diesel dispensing.2006 New tank bottoms in tk's 7 & 8.

The separator was expanded from 1 bay to 4 bays , to hold about three times more water in 1996. 2004 coalescing plates were added to each bay. Acid Tank and containment area built in 2005.2006 Marine terminal rack upgrade for Bio diesel dispensing.2006 New tank bottoms in tk's 7 & 8.

Great Western Chemical Corporation: Lease hold improvements were continually completed at tenants expense. Changes were made to the following areas; drumming, offices, tank farm, bulk storage plumbing and electrical. GWC Front, LLC paid for no tenant improvements. Any and all records were destroyed when Great Western dissolved under Chapter 11.

Brenntag Pacific, Inc and Newco, Inc: Currently occupies the old Great Western Chemical warehouses please reference their 104-E form for further information.

Construction Plans are in Appendix A

- l. all maps and drawings of the Property in your possession; and
Site maps are in each of the environmental reports in Appendix B. Construction plans, utility maps, and other miscellaneous maps are in Appendix A.
 - m. all aerial photographs of the Property in your possession.
Aerial photographs for 1948, 1956, 1971, 1975, and 1990 are in Appendix B of the April 1994 Preliminary Assessment of McCall Oil and Chemical and Great Western Chemical Company (see Appendix B o this submittal).
14. For Properties adjacent to the Willamette River, provide specific information describing the river-ward boundary of private ownership and where state aquatic lands and/or state-management jurisdiction begins. Provide a map that delineates the river-ward boundary of each Property.

Maps of property boundaries are in Appendix A

15. For each Property, provide all reports, information or data you have related to soil, water (ground and surface), or air quality and geology/hydrogeology at and about each Property. Provide copies of all documents containing such data and information, including both past and current aerial photographs as well as documents containing analysis or interpretation of such data.

See Appendix B (Anchor Environmental Reports)

16. Identify all past and present solid waste management units or areas where materials are or were in the past managed, treated, or disposed (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas, etc.) on each Property. For each such unit or area, provide the following information:

- a map showing the unit/area's boundaries and the location of all known units/areas whether currently in operation or not. This map should be drawn to scale, if possible, and clearly indicate the location and size of all past and present units/areas;
- dated aerial photograph of the site showing each unit/area;
- the type of unit/area (e.g., storage area, landfill, waste pile, etc.), and the dimensions of the unit/area;
- the dates that the unit/area was in use;
- the purpose and past usage (e.g., storage, spill containment, etc.);
- the quantity and types of materials (hazardous substances and any other chemicals) located in each unit/area; and
- the construction (materials, composition), volume, size, dates of cleaning, and condition of each unit/area.

Tanks, storage areas, and process area are shown in Figure 2-4 of the November 2000 McCall Oil and Chemical Corporation Focused Remedial Investigation Workplan (see Appendix B)

Marine Terminal Asphalt 547,790 bbls Bunker 222,000bbls Diesel 130,000 bbls Bio Diesel 11,000 bbls These are max fills not typical. Paint shed, various paints in (est 30 gals . Gas for boat 10 gals. 250 Gallon plastic tote Schaeffer 137 ulsw diesel additive. 1 550 gallon steel tote + 1, 350 gallon steel tote Innospec OLI-901.X diesel additive. 1, 550 gallon steel tote + 1, 350 gallon steel tote UNISOL Liquid Red BHF 50 DYE Boiler chemicals 1, 250 gallon plastic tote Mt Hood Chemical MH2303. 1, 55 gallon plastic drum boiler chemical Mt. Hood Oxygone. 1, 55 gallon plastic drum Mt Hood boiler chemical Contane .

Shop Various lubricants, citrus spray solvents and greases

Asphalt Plant Flux 1,213 bbls, Asphalt 34,500 bbls. Emulsified Asphalt 333 bbls. Poly Phosphoric Acid 123 bbls. 1 plastic 55 gallon drum Mt. Hood Boiler Chemical Oxygone. 1 55 gallon plastic drum, Mt Hood chemical MH 2302. 1 55 Gallon steel drum d-Limonene solvent.

g the construction (materials, composition), volume, size, dates of cleaning, and condition of each unit/area

Tank No.	Substance Stored	Year Cleaned	Tank Type	YEAR	Dimensions Diam x Height	Maximum Shell Capacity (barrels)
1	Asphalt		Steel - Cone Roof	1974	200' x 49'	267,790
2	Asphalt	Sucked out API 653 2007	Steel - Cone Roof	1973	220' x 41'	280,650
4	Asphalt/Black Oil - Intermittent	Sucked out API 653 2007	Steel- Cone Roof	1976	200' x 40'	222,808
5	Bio Diesel	2006 API 653	Steel-Cone Roof	1974	11.5' x 35'	648
6	Bio Diesel	2006 API 653	Steel- Cone Roof	1974	11.5' x 35'	648
7	Low Sulfur Diesel	2006 API 653	Steel-Internal Float	1978	100' x 50'	63,303

	Ultra Low Sulfur Diesel	2006 API 653	Steel- Internal Float	1977	100' x 50'	63,821
9	Bio Diesel	2007 API 653	Steel-Cone Roof	1979	45' x 44'	11,262
10	Low Sulfur Diesel	2006	Steel-Internal Float	1974	45' x 44'	11,171
11	Oil and Water	Drained Empty 2007	Steel-Cone Roof	1974	11.5' x 26'	480
12	Oil and Water	Drained Empty 2007	Steel-Cone Roof	1974	9.75' x 18'	240
15	Flux	Drained Empty 2008	Steel- Cone Roof	1986	11' x 31'	494
16	Flux	Drained Empty 2007	Steel-Cone Roof	1989	12.5' x 33'	719
18	Anti-Strip		Steel-Cone Roof	1989	7' x 17'	110
19	Asphalt		Steel-Cone Roof	1954	42.5'x 40'	9,642
20	Asphalt		Steel-Cone Roof	1954	42.5'x 40'	9,645
21	Asphalt		Steel-Cone Roof	1954	42.5'x 40'	9,641
22	Emulsified Asphalt		Steel-Cone Roof	1954	14'x19'	333
23	Storm Water		Steel-Cone Roof	1954	14'x19'	334
24	Asphalt		Steel-Cone Roof	2000	20'x40'	1900
25	Asphalt		Steel -Cone Roof	2000	20'x40'	1900
26	Asphalt		Steel-Cone Roof	2000	20'x40'	1900
27	Asphalt		Steel-Cone Roof	2000	20'x40'	1900
28	Boiler Fuel (PS-300)		Steel-Cone Roof	1954	10'x14'	199
33	Poly Phosphoric Acid		Stainless Steel-Cone Roof	2005	7'7" x16'	123

*Notes: One barrel is equivalent to 42 gallons. Tank 4 will store bunker oil from October 1 through August 15 each year, and store asphalt during the remainder of each year.

17. See answer to question number 4 and Appendix D: Number 2 If the unit/area described above is no longer in use, how was such unit/area closed and what actions were taken to prevent or address potential or actual releases of waste constituents

from the unit/area. No Changes have been made in the unit/area. See answer to number 4 regarding Great Western Chemical, Quadra and Brenntag Pacific.

18. For each Property, provide the following information regarding any current or former sewer or storm sewer lines or combined sanitary/storm sewer lines, drains, ditches, or tributaries discharging into the Willamette River:
- the location and nature of each sewer line, drain, ditch, or tributary;
Utility maps of sanitary sewer lines are in Appendix A. Two stormwater outfalls connect to the Willamette River as shown in Figure 2-4 of the November 2000 McCall Oil and Chemical Corporation Focused Remedial Investigation Workplan (see Appendix B). One outfall comes from the oil/water separator on the McCall Facility and the other drains stormwater from the Brenntag facility.
 - the date of construction of each sewer line, drain, ditch, or tributary;
Where available, dates of sewer line installation are on the utility maps in Appendix A
 - whether each sewer line, or drain was ever connected to a main trunk line;
 - whether each sewer line, drain, ditch, or tributary drained any hazardous substance, waste, material or other process residue to the Willamette River; and
 - provide any documentation regarding but not limited to the following on any and all outfalls to the Willamette River which are located within the boundaries of the Property(ies). Your response should include, but not be limited to:
 - the areas serviced by the outfalls; and
 - the type of outfall (i.e., storm water or single facility operational).
- See Appendix C: McCall Oil and Chemical Corp Storm Water Pollution Control Plan. See answer to number 4 regarding Great Western Chemical, Newco, Inc, Quadra and Brenntag Pacific.

19. Provide copies of any stormwater or property drainage studies, including data from sampling, conducted at these Properties on stormwater, sheet flow, or surface water runoff. Also provide copies of any Stormwater Pollution Prevention, Maintenance Plans, or Spill Plans developed for different operations during the Respondent's operation of each Property.

Most recent stormwater and catch basin sediment data is in the April 30, 2008 Plann to Update Remedial Investigation and 2006 Source Control Evaluation reports for the McCall Oil Site (see Appendix B). See Appendix C: Storm Water Pollution Control Plan. See answer to number 4 regarding Great Western Chemical, Newco, Inc, Quadra, and Brenntag Pacific.

Section 4.0 Respondent's Operational Activities

20. Describe the nature of your operations or business activities at each Property. If the operation or business activity changed over time, please identify each separate

operation or activity, the dates when each operation or activity was started and, if applicable, ceased.

The two tax lots are currently occupied by three separate operating companies: McCall Oil and Chemical, which operates a marine terminal and asphalt facility, Newco and Brenntag chemical distribution companies.

21. At each Property, did you ever use, purchase, generate, store, treat, dispose, or otherwise handle any waste, or material? If the answer to the preceding question is anything but an unqualified "no," identify:
 - a. in general terms, the nature and quantity of the waste or material so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled;
 - b. the chemical composition, characteristics, physical state (e.g., solid, liquid) of each waste or material so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled;
 - c. how each such waste or material was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you; and
 - d. the quantity of each such waste or material used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you.
22. See Appendix D: Tab #2. See answer to number 4 regarding Great Western Chemical, Newco, Inc., Quadra, and Brenntag Pacific. Describe all activities at each Property that was conducted over, on, or adjacent to, the Willamette River. Include in your description whether the activity involved hazardous substances, waste(s), or materials and whether any such hazardous substances, waste(s), or materials were discharged, spilled, disposed of, dropped, or otherwise came to be located in the Willamette River.

McCall operates a Marine Terminal. Product can be received via pipeline, railcars, trucks or by water. McCall can also ship product via railcar, trucks, or by water. Tables 1 and 2 of the September 2006 Assessment of McCall Oil and Chemical Site Impacts to the Willamette River (Appendix B) list McCall and Great Western Chemical historical spill releases. Releases to the River are summarized below:

Mid-1970's slop tank valve inadvertently left open and an unknown quantity of oil and water was released into the Willamette River

Mid-1970's an unknown quantity of asphalt was released at the marine dock to the river

1991 a barge hose burst during asphalt loading operations at the new marine dock resulting in the release of an unknown quantity of asphalt to the river

10/13/98 oil and water spill OERS No. 98-2471. Temporary blockage of outlet for the new oil/water separator resulted in a light seep on river. Estimate less than 2 gallons of diesel

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

23. For each Property at which there was or is a mooring facility, dock, wharf or any over-water structure, provide a summary of over-water activities conducted at the structure, including but not limited to, any material loading and unloading operations associated with vessels, materials handling and storage practices, ship berthing and anchoring, ship fueling, and ship building, retrofitting, maintenance, and repair.
1. The terminal has the capacity to moor and transfer to or from:
 2. One tanker (60 DWT) on the river side of the dock and one river barge or tug on the shore side of the dock.
 3. One barge or tug on the river side of the dock and one river barge or tug on the shore side of the dock.
 4. We receive from the dock from either ship or barge, Asphalt, Bunker Oil and #2 Diesel fuel. We deliver from dock to ships, barges and tugs. Products delivered were Asphalt, Bunker Oil or blends (bunker oil, diesel, and or RFO) Diesel fuel to barges or as tug fuel. There was some ship fueling but no retrofitting, maintenance or repairs.
 5. See Appendix D: DSL Leases
24. Describe all activities conducted on leased aquatic lands at each Property. Include in your description whether the activity involved hazardous substances, waste(s), or materials and whether any such hazardous substances, waste(s), or materials were discharged, spilled, disposed of, dropped, or otherwise came to be located on such leased aquatic lands.
- Loading and off loading of vessels at our dock. No hazardous substances, waste (s), or materials were discharged, spilled disposed of, dropped or otherwise came to be located on such leased aquatic lands.
25. Please describe the years of use, purpose, quantity, and duration of any application of pesticides or herbicides on each Property during the period of investigation (1937 – present). Provide the brand name of all pesticides or herbicides used.
- Major Spray Service has been treating for weeds on the property for 20 years or more. McCall Oil and Chemical contacted a representative from this company and they declined to give McCall any information regarding what herbicides have been used over the years. 11605 SW 35th Ave, Portland, OR 97206 Tel. 503 245-4549.
- See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.
26. Describe how wastes transported off the Property for disposal are and ever were handled, stored, and/or treated prior to transport to the disposal facility.

McCall Oil and Chemical: Oily rags, used spill diapers, oily soil, soil with asphalt and asphalt coke are drummed up to be hauled away. Oil skimmed from API separator is skimmed off and stored in our 2 slop tanks for disposal. Lab solvents are stored in 55 gallon drums with 100% containment and disposed of once a year with proper waste classification and certificates. (Pollution Control Industries, 5485 Tay-For Dr, Millington, TN 38053 Facility EPA ID: TND000772186

27. See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific. Has Respondent ever arranged for disposal or treatment or arranged for transportation for disposal or treatment of materials to any Property (including the Willamette River) within the Investigation Area? If so, please identify every Property that Respondent's materials were disposed or treated at in the Investigation Area. In addition, identify:
- the persons with whom the Respondent made such arrangements;
 - every date on which Respondent made such arrangements;
 - the nature, including the chemical content, characteristics, physical state (e.g., solid, liquid), and quantity (volume and weight) of all materials involved in each such arrangement;
 - in general terms, the nature and quantity of the non- hazardous materials involved in each such arrangement;
 - in general terms, the nature and quantity of any hazardous materials involved in each such arrangement;
 - the owner of the materials involved in each such arrangement, if not Respondent;
 - all tests, analyses, analytical results or manifests concerning each hazardous material involved in such transactions;
 - the address(es) for each Property, precise locations at which each material involved in such transactions actually was disposed or treated;
 - the owner or operator of each facility at which hazardous or non-hazardous materials were arranged to be disposed at within the Investigation Area;
 - who selected the location to which the materials were to be disposed or treated;
 - who selected the Property as the location at which hazardous materials were to be disposed or treated; and
 - any records of such arrangement(s) and each shipment.

Appendix: D Tab #2 for these details.

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

28. Describe the plants and other buildings or structures where Respondent carried out its operations at each Property within the Investigation Area (excluding locations where ONLY clerical/office work was performed).

Marine Terminal includes :

1. Eleven (11) above ground storage tanks with a total combined capacity of 922,000 barrels. These tanks are for receiving and delivering of products
2. One 922 foot dock for tankers, barges, and tug boats with dock house.
3. One four bay truck loading rack for loading and off loading of Bunker fuel, Diesel and Bio Diesel.
4. One electrical / boiler room with one natural gas/diesel fired boiler.
5. Complete office facilities with 4 storage trailers.
6. One eight foot earthen dike surrounding the tank farm.
7. One four bay API Oil/Water Separator.
8. One Dock sprinkler shed @ the foot of the dock
9. One paint shed, where paint supplies are kept
10. One Boat house where spill boat and spill supplies are kept.
11. One maintenance shop where light maintenance duties are performed.
12. One drivers trailer (drivers change room)/ maintenance office
13. One spill supplies trailer
14. One pipeline / electrical shed. Olympic pipeline controls, electrical breakers

Asphalt Plant includes:

1. Fourteen (14) above ground storage tanks with a combined capacity of 40,000 barrels. These tanks are for receiving and delivering of products.
 2. One three bay loading rack for loading and off loading of asphalt.
 3. One boiler room with one natural gas / diesel fired boiler.
 4. One electrical room / blending room.
 5. One lab where all products are tested.
 6. Two, four car rail spurs.
 7. One gas / diesel fired asphalt retort
 8. Two gas fired Hot Oil Heaters
 9. One sample / supplies trailer
29. Provide a schematic diagram or flow chart that fully describes and/or illustrates the Respondent's operations on each Property.

See Appendix D: Tab 20

See Appendix A: Misc. Maps and Utility Plans

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

30. Provide a brief description of the nature of Respondent's operations at each location on each Property including:
- a. the date such operations commenced and concluded; and
 - b. the types of work performed at each location, including but not limited to the industrial, chemical, or institutional processes undertaken at each location.
- The following information is from the November 2000 McCall Oil and Chemical Corporation Focused Remedial Investigation Workplan in combination with assessor's map

Tax Lot: 1300

Before 1966, most of this lot was submerged beneath the Willamette River. The Port of Portland created new land along the Willamette during the mid 1960s by dredging and filling along the shore. This land was deeded to the Port by the state of Oregon in 1967. In the mid-1970s, McCall Oil and Chemical constructed the Marine Terminal.

Tax Lot 100 & 1000:

In the mid-1920s, the Port purchased the property now occupied by McCall as part of an approximately 65-acre parcel that stretched from the lands owned by Union Oil Company of California (Unocal) on the west, to the Willamette River. Prior to the mid-1940s the property was vacant. In 1946, Pioneer Flintkote Company (Flintkote) purchased two parcels from the Port, corresponding generally to present site tax lots 1000 and 100. These tax lots are currently occupied by Brenntag, Newco and the McCall asphalt plant, respectively.

Flintkote manufactured asphalt roofing shingles and tiles on the property from 1947 to approximately 1982. A factory, a warehouse for roofing material, silos, boilers, aboveground and underground storage tanks (ASTs and USTs, respectively), and retorts were situated on tax lot 1000. Historical occupation records indicate that Standard Oil Company operated a distribution center at the address corresponding to adjacent tax lot 100 during the 1950s (SAFE, 1994). By 1960, Douglas Oil Company (Douglas) occupied this address, and operated an asphalt facility. In 1962, Douglas purchased tax lot 100 from Flintkote. Douglas and Flintkote continued to operate their respective facilities until 1982, when both parcels and the improvements were sold to McCall. Erro Enterprises (Erro), a McCall family subsidiary, purchased the asphalt facility from MOCC in 1982 and operated the facility until 1992, when it was sold back to McCall. GWC Properties, Inc., now owns tax lot 1000.

Chemax began operations on the former Flintkote site in early 1984. The Portland branch began its on-site operations in late 1985. In 1985, McCall

operated a lube oil distribution facility on part of the asphalt plant site. The lube oil operations were discontinued in 1991.

See answer to number 4 regarding Great Western Chemical, Quadra, and Brenntag Pacific.

31. If the nature or size of Respondent's operations changed over time, describe those changes and the dates they occurred.

McCall Oil and Chemicals nature or size of the business has not changed over time. McCall has always provided wholesale bulk petroleum products.

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

32. List the types of raw materials used in Respondent's operations, the products manufactured, recycled, recovered, treated, or otherwise processed in these operations.

Products manufactured are Paving Grades of asphalt and an emulsion base asphalt. Recovered products are asphalt, bunker, diesel and bio diesel. Asphalt spills are recovered in the asphalt re-claimer and returned to day storage tank. Diesel, bio diesel and bunker drips are collected in drip containers and collected in totes which are then pumped to the bunker storage tank. Bunker, diesel and bio diesel retain samples are also handled in the same way.

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

33. Provide copies of Material Safety Data Sheets (MSDS) for materials used in the Respondent's operations.

See Appendix D: Tab MSDS' CD for McCall Oil and Chemical

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

34. Describe the cleaning and maintenance of the equipment and machinery involved in these operations, including but not limited to:

a. the types of materials used to clean/maintain this equipment/machinery;

Asphalt plant: Asphalt drips from pumps, mixers and packing are collected in drip containers. Any other asphalt is scraped up in to drip containers and diesel or citrus solvent may be used to clean parts and then wiped down with rags. Asphalt rail car fittings are soaked in a drum of diesel and then cleaned. When drum becomes dirty, this drum is then pump to a storage tank at the marine terminal. Pumps, swivels and valves are greased periodically with an all purpose grease. Teflon tape for threading pipe fittings. Assorted lubricant sprays, grease.

Marine Terminal, all pumps and valves are checked daily for any drips or leaks. Any leaks are wiped up with spill diapers and cleaned with citrus solvent. All loading arms and dock risers have drip buckets to collect any drips.

Water and oil base paint for painting of piping, walkways, ramps and structures. Cleaning of paint brushes and rollers is either by water or diesel.

the monthly or annual quantity of each such material used;

One drum annually of citrus solvent, one drum monthly of diesel , 10 diaper pads monthly 1 box 20 lbs box of rags every two months.

c. the types of materials spilled in Respondent's operations;

Citrus solvent, Diesel, Grease

d. the materials used to clean up those spills;

Spill diapers / rags

e. the methods used to clean up those spills; and wiped up

f. where the materials used to clean up those spills were disposed of

materials placed in waste drums.

35. Describe the methods used to clean up spills of liquid or solid materials during Respondent's operation.

Asphalt is cooled with water than rolled up and recycled in asphalt reclaimer. Asphalt with gravel and dirt put into drums for disposal off site. Bunker spill in tank farm is contained in area, liquid scooped up, pumped into drums or vac truck and than return to storage. Bunker with dirt and gravel placed in drums for removal off site.

Diesel spill in tank farm is contained in area, liquid scooped up, pumped into drums or vac truck and than return to storage or hauled off site. Diesel contaminated soil placed in drums for removal off site.

Bunker spill under loading rack, valve going to separator near office is closed, If large spill over 50 gals, vac truck called to suck up oil, after oil is squeegee remaining oil is hosed into drain to large culvert pipe by office and pumped to slop tank. Tank is let to settle, water is than drained off to API separator. Oil is collected in tank for disposal.

Diesel spill under loading rack, valve going to separator near office is closed, If large spill over 50 gals, vac truck called to suck up oil, after oil is squeegee remaining oil is hosed into drain to large culvert pipe by office and pumped to slop tank. Tank is let to settle, water is than drained off to API separator. Oil is collected in tank for disposal.

Bunker spill at dock, boom deployed to contain spill. Spill contactor notified for assistances, skimmers used to collect oil. Collected oily water pump to truck and sent to oil recycler. Spill diapers and oil snares placed in plastic bags and sent to disposal facility.

Diesel spill at dock, boom deployed to contain spill. Spill contactor notified for assistances, skimmers used to collect oil. Collected oily water pump to truck and sent to oil recycler. Spill diapers and oil snares placed in plastic bags and sent to disposal facility

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

36. For each type of waste (including by-products) from Respondent's operations, including but not limited to all liquids, sludges, and solids, provide the following information:

a its physical state;

Asphalt	Semi-solid
Emulsion Base Asphalt	Solid at ambient temperatures
Diesel	Liquid
Bunker	Liquid
Bio Diesel	Liquid
Poly Phosphoric Acid	

b its nature and chemical composition;

Asphalt
Asphalt 99.9% Min. **Hydrogen Sulfite** 0.10%Max.
Emulsion Base Asphalt
Asphalt 56 to 61%
Hydrogen sulfite 0.10% Max
Emulsifiers 1 % Max
Water 39 to 44%
Diesel Hydrocarbons 95% Min.
Naphthalene .05% Max.
Xylene 0.6%Max.
Trimethly Benzene 0.6 Max
Bunker Fuel Oil Residual 65 to 100%
High Sulfur Diesel 0 to 10%
Cutter Stock 0 to 25%
Hydrogen Sulfide Trace
Benzene Trace
Bio Diesel
Poly Phosphoric Acid

- a. its physical state;
b. its nature and chemical composition;
c. its color;
d. its odor;
e. the approximate monthly and annual volumes of each type of waste (using such measurements as gallons, cubic yards, pounds, etc.); and
f. the dates (beginning & ending) during which each type of waste was produced by Respondent's operations.

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

37. Provide a schematic diagram that indicates which part of Respondent's operations generated each type of waste, including but not limited to wastes generated by cleaning and maintenance of equipment and machinery and wastes resulting from spills of liquid materials.

See Appendix D: 20 Yellow Highlighted areas.

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

38. Identify all individuals who currently have and those who have had responsibility for Respondent's environmental matters (e.g. responsibility for the disposal, treatment, storage, recycling, or sale of Respondent's wastes). Also provide each individual's job title, duties, dates performing those duties, supervisors for those duties, current position or the date of the individual's resignation, and the nature of the information possessed by such individuals concerning Respondent's waste management.

McCall Oil and Chemical:

Edgar S. McCall 1/1/02 – Present

Lee Zimmerli 11/7/83-12/31/01

Both job titles: Risk Manager

Robert H. McCall does not know whether Lee worked in this capacity from his original date of hire. Prior to Lee Zimmerli, the entire organization had no individuals with environmental oversight. Lee Zimmerli reported to W.C. McCall (deceased) until the mid 1990's. Lee Z. then reported to R.H. McCall. Edgar McCall has always reported to R.H. McCall.

Rick Arrasmith (Terminal Manager), Ray Verzosa (Terminal Manager), Bernie Fisher (Terminal Manager), Geary Powell (Terminal Manager), Al Jacques (Terminal Manager), Vance Stanza (Assistant Terminal Manager), Dave Bauger (Terminal Manager), Lee Zimmerly (Risk Manager), John Golightly (Environmental) Great Western Chemical, Ron Brown (Terminal Manager), Tom Azevedo (Assistant Terminal Manager) Ted McCall (Risk Manager).

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

39. For each type of waste describe Respondent's contracts, agreements, or other arrangements for its disposal, treatment, or recycling.

See answer to question 35 and Appendix D: Tab 2 for McCall Oil and Chemical

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

40. Provide copies of such contracts and other documents reflecting such agreements or arrangements, including, but not limited to the following:
- a. state where Respondent sent each type of its waste for disposal, treatment, or recycling
Asphalt tank bottoms, Asphalt Quart sample cans, Asphalt, heavy fuel oil or diesel mixed with sand from clean up, pump packing, tanks boiling over St Johns land fill , Ash build up from boiler Hillsboro land fill .
Sample cans asphalt to Waste Management .
Asphalt tank bottoms, Asphalt, heavy fuel oil or diesel mixed with sand from clean up, pump packing, asphalt tanks run overs, Waste Watch Environmental Quality .
Bunker , Diesel tank bottoms, Foss Enviro, NRC, CCS ,Haul to Spencer Enviro. Thermo Fluids Oil Rerefinery
Lab Hazardous waste Safety-Kleen Systems , Waste Watch Environmental Quality bottoms, Foss Enviro, NRC, CCS ,Haul to Spencer Enviro. Thermo Fluids Oil Rerefinery, Lab Hazardous waste Safety-Kleen Systems , Waste Watch Environmental Quality
See Appendix D: Tab 2 for McCall Oil and Chemical
See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.
- b. identify all entities and individuals who picked up waste from Respondent or who otherwise transported the waste away from Respondent's operations (these companies and individuals shall be called "Waste Carriers" for purposes of this Information Request);
McCall Oil, Foss Enviro, NRC, CCS , Environmental Quality ,Waste Watch. Waste Management
See Appendix D: Tab 2 for McCall Oil and Chemical
See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.
- c. if Respondent transported any of its wastes away from its operations, please so indicate;
Yes
- d. for each type of waste specify which Waste Carrier picked it up;
Tank Bottoms, slop tanks, Foss Enviro, NRC, Spencer Enviro, Thermo Fluids Separator Cleaning, Storm drains ,slop tank , Foss Enviro., NRC
Asphalt sample cans, McCall Oil , Waste Management
See waste Appendix D: Tab 2 Carriers Addresses

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

- e. indicate the ultimate disposal/recycling/treatment location for each type of waste;
See Appendix D: Tab 2

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

- f. provide all documents indicating the ultimate disposal/recycling/treatment location for each type of waste; and

See Appendix D: Tab 2

See answer to number 4 regarding Great Western Chemical, Newco, Quadra and Brenntag Pacific.

- g. state the basis for and provide any documents supporting the answer to the previous question.

See Appendix D: Tab 2

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

- 41. Describe all wastes disposed by Respondent into Respondent's drains including but not limited to: Storm Water and

- a. the nature and chemical composition of each type of waste;

Asphalt

Asphalt 99.9% Min. **Hydrogen Sulfite** 0.10%Max.

Emulsion Base Asphalt

Asphalt 56 to 61% **Hydrogen sulfite** 0.10%Max

Emulsifiers 1 % Max **Water** 39 to 44%

Diesel

Hydrocarbons 95% Min. **Naphthalene** .05% Max. **Xylene** 0.6%Max. **Trimethly**

Benzene 0.6 Max

Bunker Fuel Oil Residual 65 to 100% **High Sulfur Diesel** 0 to 10% **Cutter Stock** 0 to 25% **Hydrogen Sulfide** Trace **Benzene** Trace

Bio Diesel

Poly Phosphoric Acid

- b. the dates on which those wastes were disposed

See Appendix D: Tab 2

- c. the approximate quantity of those wastes disposed by month and year;

See Appendix D: Tab 2

- d. the location to which these wastes drained (e.g. septic system or storage tank at the Property, pre- treatment plant, Publicly Owned Treatment Works (POTW), etc.); and

Slop tanks from Separator. Reclaimed oil from drip buckets sample cans collected in (2) totes and pump back to storage tank.

- e. whether and what pretreatment was provided.

None

See answer to number 4 regarding Great Western Chemical, Newco, Quadra and Brenntag Pacific.

42. Identify any sewage authority or treatment works to which Respondent's waste was sent.

None

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

Describe all settling tank, septic system, or pretreatment system sludges or other treatment wastes resulting from Respondent's operations. At times, storm water is collected in two slop or storm water tanks. The oil and water are allowed to separate by gravity in the tanks. The water is discharged into the API oil/water separator, allowing the further separation of any residual oil from the water. Once the water has gone through the separator, the water is discharged into the Willamette River per McCall Oil's NPDES permit. The oil recovered from the four-cell separation process is removed from the subject site by a used oil reclamation facility. The new four-cell system has a holding capacity over four times larger than the old system that operated prior to 1998.

Water is drained out of the slop tanks manually by an operator. The discharge of water into a drain that leads to the API oil/ water separator is monitored continuously. When the water starts to change color, indicating that the tank level is at the oil/water interface, the discharge operation is shut down.

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

43. If applicable, describe the facilities, processes and methods Respondent or Respondent's contractor used, and activities engaged in, either currently or in the past, related to ship building, retrofitting, maintenance or repair, including, but not limited to, dry-docking operations, tank cleaning, painting and re-powering. Not applicable to McCall Oil and Chemical.

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

Describe any hazardous substances, wastes, or materials used or generated by the activities described in response to the previous Question and how these hazardous substances, materials and wastes were released or disposed of. None. See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

44. Provide copies of any records you have in your possession, custody or control relative to the activities described in response to the previous two Questions. None

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

45. Describe any process or activity conducted on a Property identified in response to Question 4 involving the acquisition, manufacture, use, storage, handling, disposal or release or threatened release of polychlorinated biphenyl(s) ("PCB(s)" or PCB(s)-containing materials or liquids. None

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

46. For each process or activity identified in response to the previous Question, describe the dates and duration of the activity or process and the quantity and type of PCB(s) or PCB(s) containing materials or liquids. None

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

47. For each process or activity identified in response to the previous two Questions, identify the location of the process or activity on the property.

Section 5.0 Regulatory Information

48. Identify all federal, state and local authorities that regulated the owner or operator of each Property and/or that interacted with the owner or operator of each Property. Your response is to address all interactions and in particular all contacts from agencies/departments that dealt with health and safety issues and/or environmental concerns.

Appendix B: All Appendix C: SPCC Plan Appendix D: Tabs 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 18, 19, 22,

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

49. Describe all occurrences associated with violations, citations, deficiencies, and/or accidents concerning each Property during the period being investigated related to health and safety issues and/or environmental concerns. Provide copies of all documents associated with each occurrence described.

1970 to 1998 Approximately 300 gallons of diesel oil was spilled in 1974 to the Willamette River, approximately one gallon of bunker fuel was spilled in 1975 to the Willamette River and in 1978 approximately 1,000 gallons of slops was discharged from the oil /water separator to the Willamette River . October 13, 1998 approximately 2 gallons of diesel fuel was discharged as a result of a spill pillow getting caught in discharge line of separator and spilled in to the Willamette River, (item #51 A). On 11/19/1999 80 to 85 gals bunker released @ railspur(item 51B). 5/22/2000 large amount of Sulfuric Acid released from Great Western Chemical by pipe support next to rail spur. (item # 51C) 5/29/2000 Tug Jessie released

approximately 3 gallons of diesel fuel into Willamette River(Item #51D). 10/04/2000 250-300 gallon release of bunker fuel inside Marine Terminal diked area(Item #51E).10/01/2005 approximately 300 gallons of Asphalt Flux released at asphalt plant, gasket on flanged failed.(item #51F).08/07/06 While loading Barge BMC 4 ,Barge has a releases of approximately 15 gallons of diesel Fuel (Item #51G). 05/07/2007 Asphalt truck loading at asphalt rack boils over asphalt, approximately 200/300 gallons of asphalt.(Item #51H). 05/15/07 Truck driver loading diesel at marine term rack releases approximately 200 gallons of diesel, spill contained in drains and drains sucked out by NRC.(Item #51 I) .11/12/2007 Fueling Tug

Black Hawk @ Marine Terminal dock, approximately 50 Gallons of diesel oil spills out of tug vents into Willamette River (item # 51J).

DOT Violations : On 09/22/1998 McCall Oil was cited for 7 violations . 1) Failure to register with DOT. 2) Failure to use proper shipping name on bill of lading. 3) Failure to include emergency response information on MSDS. 4) Failure to maintain a 24 hour monitored emergency response number. 5) Failure to include a 24-hour emergency response number on BOL. 6) Failure to train as required by HM 126F. 7) Failure to maintaining records for employees(ITEM 51K).

DEQ Violations On 11/02/1996 McCall Oil was cited for 5 violations 1) McCall oil Violated 40CFR262.34(d)(2)1 and 40CFR 265.174 By failing to perform weekly inspections of hazardous waste storage drums. 2) McCall Oil violated 40 CFR 262.34(d)(5)(ii) by failing to post emergency information next to the telephone. (3) McCall Oil violated 40CFR268.7(a)(7)by failing to provide land disposal restriction notifications for restricted wastes transported off site. (4) McCall Oil violated 40CFR 268.7(a)(1)(i) by failing to write the waste codes on the related land disposal notification. (5) McCall Oil violated 40CFR262.42(b) by failing to submit a exception report.(ITEM #51L)

Oregon Department of

Consumer and Business Services: (3) Citations

Item 1a 29 CFR 1910.146(d)(3) under the permit –required confine space program required by 29 CFR1910.146(c)(4), the employer did not develop and implement the means, procedures and practices necessary for safe permit entry operations. a) For lack of a permit-required confined space written program on 11-17-99 to cover entry into confined spaces at McCall Oil such as the rail pit

Item 1b 29 CFR 1910.146©(2) For rail Pit hatch which was not marked as a confined space, on or about 11-17-99. **Item 1c** 29CFR 1910.146(d)(9). For lack of rescue procedure for confine space entries at McCall Oil on or about 11-17-99. **1**

Item 1d 29 CFR 1910.146(d)(4)(ii), 29CFR1910.146(c)(4),29CFR1910.146(d)(5) Biosystems not functioning properly and giving false readings Gas Meter. **1 Item 2** OAR 437-02-378(4)(a) for piping not labeled Hot Asphalt and Diesel. **1 Item 3** 29 CFR 1910.1001(j)(2)(i) For the internal insulation in the backup boiler which was found to contain asbestos on or about 11-15-99

Tables 1 and 2 of the September 2006 Assessment of McCall Oil and Chemical Site Impacts to the Willamette River (Appendix B) list McCall and Great Western Chemical historical spill releases.

See Appendix D: Tab 20 for McCall Oil

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

50. Provide a list of all local, state and federal environmental permits ever issued to the owner or operator on each Property (e.g., RCRA permits, NPDES permits, etc.). Please provide a copy of each federal and state permit, and the applications for each permit, ever issued to the owner or operator on each Property.

See Appendix D: Tabs 4, 5, 6, 7, 11, 18,

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

51. Did the owner or operator ever file a Hazardous Waste Activity Notification under the RCRA? If so, provide a copy of such notification. Do not know.

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

52. Did the owner or operator's facility on each Property ever have "interim status" under the RCRA? If so, and the facility does not currently have interim status; describe the circumstances under which the facility lost interim status. No

53. See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific. Provide all RCRA Identification Numbers issued to Respondent by EPA or a state for Respondent's operations. None

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

54. Identify all federal offices to which Respondent has sent or filed hazardous substance or hazardous waste information. State the years during which such information was sent/filed. None

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

55. Identify all state offices to which Respondent has sent or filed hazardous substance or hazardous waste information. State the years during which such information was sent/filed. None

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

56. List all federal and state environmental laws and regulations under which Respondent has reported to federal or state governments, including but not limited to: Toxic

Substances Control Act, 15 U.S.C. Sections 2601 et seq., (TSCA); Emergency Planning and Community Right-to-Know Act, 42 U.S.C. Sections 1101 et seq., (EPCRA); and the Clean Water Act (the Water Pollution Prevention and Control Act), 33 U.S.C. Sections 1251 et seq., Oregon Hazardous Substance Remedial Action Law, ORS 465.315, Oregon Water Quality law, ORS Chapter 468(b), Oregon Hazardous Waste and Hazardous Materials law, ORS Chapters 465 and 466, or Oregon Solid Waste law, ORS Chapter 459. Provide copies of each report made, or if only oral reporting was required, identify the federal and state offices to which such report was made. None

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

57. Provide a copy of any registrations, notifications, inspections or reports required by the Toxic Substances Control Act, 15 USC § 2601 et seq., or state law, to be maintained or submitted to any government agency, including fire marshal(s), relating to PCB(s) or PCB(s) containing materials or liquids on any Property identified in response to Question 4.

None on the behalf of McCall Oil and Chemical Corporation.

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

58. Has Respondent or Respondent's contractors, lessees, tenants, or agents ever contacted, provided notice to, or made a report to the Oregon Department of State Lands ("DSL") or any other state agency concerning an incident, accident, spill, release, or other event involving Respondent's leased state aquatic lands? If so, describe each incident, accident, spill, release, or other event and provide copies of all communications between Respondent or its agents and DSL or the other state agency and all documents that were exchanged between Respondent, its agents and DSL or other state agency.

None on the behalf of McCall Oil and Chemical Corporation. See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

59. Describe all notice or reporting requirements to DSL that you had under an aquatic lands lease or state law or regulation regarding incidents affecting, or activities or operations occurring on leased aquatic lands. Include the nature of the matter required to be reported and the office or official to whom the notice or report went to. Provide copies of all such notices or reports.

None on the behalf of McCall Oil and Chemical Corporation

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

Section 6.0 Releases and Remediation

60. Identify all leaks, spills, or releases into the environment of any waste, including petroleum, hazardous substances, pollutants, or contaminants, that have occurred at or from each Property, which includes any aquatic lands owned or leased by Respondent. In addition, identify, and provide copies of any documents regarding:
- when such releases occurred;
 - how the releases occurred (e.g. when the substances were being stored, delivered by a vendor, transported or transferred (to or from any tanks, drums, barrels, or recovery units), and treated);
 - the amount of each hazardous substances, pollutants, or contaminants so released;
 - where such releases occurred;
 - any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the release;
 - any and all investigations of the circumstances, nature, extent or location of each release or threatened release including, the results of any soil, water (ground and surface), or air testing undertaken;
 - all persons with information relating to these releases; and
 - list all local, state, or federal departments or agencies notified of the release, if applicable.

Tables 1 and 2 of the September 2006 Assessment of McCall Oil and Chemical Site Impacts to the Willamette River (Appendix B) list McCall and Great Western Chemical historical spill releases.

See Appendix D: Tab 2 for Newco spill report.

61. See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific. Was there ever a spill, leak, release or discharge of waste, including petroleum, or hazardous substances, pollutant or contaminant into any subsurface disposal system or floor drain inside or under a building on the Property? If the answer to the preceding question is anything but an unqualified "no", identify:
- where the disposal system or floor drains were located;
 - when the disposal system or floor drains were installed;
 - whether the disposal system or floor drains were connected to pipes;
 - where such pipes were located and emptied;
 - when such pipes were installed;
 - how and when such pipes were replaced, or repaired; and
 - whether such pipes ever leaked or in any way released such waste or hazardous substances into the environment.

None on the behalf of McCall Oil and Chemical Corporation

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

62. Has any contaminated soil ever been excavated or removed from the Property? Unless the answer to the preceding question is anything besides an unequivocal "no", identify and provide copies of any documents regarding:
- a. amount of soil excavated;
 - b. location of excavation presented on a map or aerial photograph;
 - c. manner and place of disposal and/or storage of excavated soil;
 - d. dates of soil excavation;
 - e. identity of persons who excavated or removed the soil, if other than a contractor for Respondent;
 - f. reason for soil excavation;
 - g. whether the excavation or removed soil contained hazardous substances, pollutants or contaminants, including petroleum, what constituents the soil contained, and why the soil contained such constituents;
 - h. all analyses or tests and results of analyses of the soil that was removed from the Property;
 - i. all analyses or tests and results of analyses of the excavated area after the soil was removed from the Property; and
 - j. all persons, including contractors, with information about (a) through (i) of this request.

The following reports (see Appendix B) document contaminated soil excavation and removal.

March 1994 Great Western Chemical Company Soil Cleanup and Groundwater Monitoring Report (Appendix L of Preliminary Assessment of McCall Oil & Chemical Corporation and Great Western Chemical Company; Volumes 1, 2, and 3)

September 29, 1989 UST Decommissioning Report - GWC (Appendix G of the November 2000 McCall Oil and Chemical Focused Remedial Investigation)

March 2001 Soil Pile Assessment and Disposal Project

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

63. Have you ever tested the groundwater under your Property? If so, please provide copies of all data, analysis, and reports generated from such testing.

Groundwater testing results are detailed in the July 2004 DRAFT Remedial Investigation Report (Volumes 1 and 2). See Appendix B of this submittal.

64. Have you treated, pumped, or taken any kind of response action on groundwater under your Property? Unless the answer to the preceding question is anything besides an unequivocal "no", identify and provide copies of any documents regarding:

- a. reason for groundwater action;

- b. whether the groundwater contained hazardous substances, pollutants or contaminants, including petroleum, what constituents the groundwater contained, and why the groundwater contained such constituents;
- c. all analyses or tests and results of analyses of the groundwater;
- d. if the groundwater action has been completed, describe the basis for ending the groundwater action; and
- e. all persons, including contractors, with information about (a) through (c) of this request.

No.

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

65. Was there ever a spill, leak, release or discharge of a hazardous substance, waste, or material into the Willamette River from any equipment, structure, or activity occurring on, over, or adjacent to the river? If the answer to the preceding question is anything but an unequivocal "no", identify and provide copies of any documents regarding:
- a. the nature of the hazardous substance, waste, or material spilled, leaked, released or discharged;
 - b. the dates of each such occurrence;
 - c. the amount and location of such release;
 - d. were sheens on the river created by the release;
 - e. was there ever a need to remove or dredge any solid waste, bulk product, or other material from the river as a result of the release? If so, please provide information and description of when such removal/dredging occurred, why, and where the removed/dredged materials were disposed.

Tables 1 and 2 of the September 2006 Assessment of McCall Oil and Chemical Site Impacts to the Willamette River (Appendix B) list McCall and Great Western Chemical historical spill releases. Releases to the River are summarized below:

- 26. Mid-1970's slop tank valve inadvertently left open and an unknown quantity of oil and water was released into the Willamette River
- 27. Mid-1970's an unknown quantity of asphalt was released at the marine dock to the river
- 28. 1991 a barge hose burst during asphalt loading operations at the new marine dock resulting in the release of an unknown quantity of asphalt to the river
- 29. 10/13/98 oil and water spill OERS No. 98-2471. Temporary blockage of outlet for the new oil/water separator resulted in a light seep on river. Estimate less than 2 gallons of diesel

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

66. For any releases or threatened releases of PCB(s), identify the date, quantity, location and type of PCB(s), or PCB(s) containing materials or liquids, and the nature of any response to or cleanup of the release.

No PCB use, storage, or disposal has occurred onsite.

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

67. For any releases or threatened releases of PCB(s) and/or PCB(s) containing materials or liquids, identify and provide copies of any documents regarding the quantity and type of waste generated as a result of the release or threatened release, the disposition of the waste, provide any reports or records relating to the release or threatened release, the response or cleanup and any records relating to any enforcement proceeding relating to the release or threatened release.

No PCB use, storage, or disposal has occurred onsite.

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific. **Section 7.0 Property Investigations**

68. Provide information and documentation concerning all inspections, evaluations, safety audits, correspondence and any other documents associated with the conditions, practices, and/or procedures at the Property concerning insurance issues or insurance coverage matters.

See Appendix D: Tab 5, 8, 10, 21, 22, 28 for McCall Oil and Chemical Corporation.

Financial and specific Insurance information has been withheld. Please read letter in Appendix: E relating to Confidential Business Information.

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

69. Describe the purpose for, the date of initiation and completion, and the results of any investigations of soil, water (ground or surface), sediment, geology, and hydrology or air quality on or about each Property. Provide copies of all data, reports, and other documents that were generated by you or a consultant, or a federal or state regulatory agency related to the investigations that are described.

Copies of reports pertaining to soil and groundwater investigation are included in Appendix B. Brief summary of investigation provided below.

1989 UST decommissioning at Great Western Chemical (soil investigation)

September 1992- January 1994: Chromated copper arsenic (CCA) soil, debris, and groundwater assessment

April 1994 Preliminary Assessment of McCall Oil & Chemical Corporation and Great western Chemical

November 2000 McCall Oil and Chemical Corporation Focused Remedial Investigation Workplan

July 2004 DRAFT Remedial Investigation Report (Volumes 1 and 2)

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

70. Describe any remediation or response actions you or your agents or consultants have ever taken on each Property either voluntarily or as required by any state or federal agency. If not otherwise already provided under this Information Request, provide copies of all investigations, risk assessments or risk evaluations, feasibility studies, alternatives analysis, implementation plans, decision documents, monitoring plans, maintenance plans, completion reports, or other document concerning remediation or response actions taken on each Property.

All remediation or response actions, investigations, risk assessments, and monitoring plans are included in Appendix B.

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

71. Are you or your consultants planning to perform any investigations of the soil, water (ground or surface), geology, hydrology, and/or air quality on or about the Property? If so, identify:

- a. what the nature and scope of these investigations will be;
- b. the contractors or other persons that will undertake these investigations;
- c. the purpose of the investigations;
- d. the dates when such investigations will take place and be completed; and
- e. where on the Property such investigations will take place.

Environmental investigations have been ongoing since 1989. Future investigations are not planned.

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

Section 8.0 Corporate Information

72. Provide the following information, when applicable, about you and/or your business(es) that are associated with each Property identified in response to Question 4:

- a. state the current legal ownership structure (e.g., corporation, sole proprietorship); All three properties are single-asset LLC's.
- b. state the names and current addresses of current and past owners of the business entity or, if a corporation, current and past officers and directors; See question #30.

All three properties have same parent company: McCall Enterprises, Inc. 5480 NW Front Ave. Portland, OR 97210

Current Ownership Dates:

GWC Front LLC Circa 1982

MOREC Front LLC 9/30/82

Tanker Basin LLC 3/5/04

Flintkote Roofing Comany

Douglas Oil Company

Port of Portland

Current and Past Officers:

Lyman Seeley 1985-2003

Don Altmun

Douglas Keifer

R.H. McCall 1980-Present

W.C. McCall (deceased) 1936-1999

Edmund B. McCall 2001-Present

Edgar S. McCall 2001-Present

Hank Hummult 2002-Present

Robert Smith 2002-Present

- c. discuss all changes in the business' legal ownership structure, including any corporate successor ship, since the inception of the business entity. For example, a business that starts as a sole proprietorship, but then incorporates after a few years, or a business that is subsequently acquired by and merged into a successor. Please include the dates and the names of all parties involved;
1937 McCall Oil Company of Longview Washington C-Corporation
The Business was a C-Corp until October 2001. In 1987 McCall Family Corporation reorganized into the following structure: McCall Heating Company, McCall Oil and Chemical Corporation and Great Western Chemical Corporation. In 2001 McCall Heating changed its name to McCall Enterprises Incorporated and changed to an S-Corp. McCall Oil and Chemical Corporation merged with McCall Enterprises. See answer to question #73 (a).
- d. the names and addresses of all current or past business entities or subsidiaries in which you or your business has or had an interest that have had any operational or ownership connection with the Properties identified in response to Question 4.

Briefly describe the business activities of each such identified business entities or subsidiaries; and

McCall Oil and Chemical Corporation- currently operates on MOREC Front LLC and Tanker Basin LLC properties.

Great Western Chemical Corporation past operator at GWC Front LLC. Entity declared bankruptcy 7/3/2001. Brenntag Pacific and Newco, Inc currently operate on the GWC Front, LLC parcel.

- e. if your business formerly owned or operated a Property identified in response to Question 4, describe any arrangements made with successor owners or operators regarding liability for environmental contamination or property damage.

With the exception of Quadra Chemicals and Great Western Chemical Corp. all other companies share the same parent company, McCall Enterprises, Inc. McCall Family Corporation was dissolved after 1987 Corporate reorganization. Quadra Chemicals does not own or share similar ownership by McCall Enterprises, Inc. or any McCall Enterprises, Inc. shareholder. Quadra was a successor entity from Montreal Canada that entered into a lease with GWC Front LLC in June 2001 after Great Western Chemical Corp. filed for bankruptcy. Great Western Chemical Corp. was a separate C-Corp. owned by the same extended family as McCall Enterprises, Inc.

Current Officers of McCall Enterprises, Inc.

R.H. McCall
Edmund B. McCall
Edgar S. McCall
Robert Smith
Hank Hummelt

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

73. List all names under which your company or business has ever operated and has ever been incorporated. For each name, provide the following information:
- a. whether the company or business continues to exist, indicating the date and means by which it ceased operations (e.g., dissolution, bankruptcy, sale) if it is no longer in business;

Great Western Chemical Corporation: DBA GW International. GW also manufactured sanitizing chemicals for the food processing industry. The products were manufactured by an affiliate called Chemax. They produced the Sanichem line of cleaners sold in the US. Great Western Chemical filed for Chapter 11 on 07/03/01.

The following companies existed under the McCall Family Corporation from 1937 to 1987. (Great Western Chemical of Washington, Great Western Chemical of California, Great Western Chemical of Spokane, Great Western Chemical Company of Portland, Great Western Chemical Company of Oregon, Great Western Chemical Company of Montana, Great Western Chemical Company of Montana, Great Western Chemical Company of Idaho, Great Western Chemical Company Inc, Chemax Corporate of Oregon, McCall Barkdust, Incorporated Oregon, Power Plant Heating Engineering Company of Oregon, McCall Heating and Professional Boiler Services Company, Washington, McCall Heating Company of Washington, McCall Oil Company of Washington, McCall Oil Company of Vancouver Washington, McCall Oil Company of King County, McCall Oil Company of Washington, McCall Marketing Company of Oregon, McCall Oil and Chemical Corporation of Washington, Beaverton Properties Inc of Oregon, McCall Oil Real Estate Corporation of Washington, GWC Properties, Inc of Washington, McCall Properties, Inc of Washington,) We were unable to identify when these entities were dissolved.

McCall Family Corporation dissolved after a reorganization in 1987. McCall Oil and Chemical 1987-2009 active and Great Western Chemical 1987- 07/03/2001. GWC Properties LLC 1987-2009 active, MOREC LLC 1983-2009 active, and Tanker Basin LLC 03-05/2004 active and McCall Properties, LLC 1987-2009 active. See Appendix: E for further details and dates.

- b. names, addresses, and telephone numbers of all registered agents, officers, and operations management personnel; and

See Appendix D: Tabs 25

- c. names, addresses, and telephone numbers of all subsidiaries, unincorporated divisions or operating units, affiliates, and parent corporations if any, of the Respondent. MOREC LLC, GWC Front LLC, Tanker Basin LLC: Contact Edmund B. McCall (5480 NW Front Ave, Portland OR 97210) 503 221-5880 ext. 2

McCall Oil and Chemical Corporation: Jim Charriere, Edgar (Ted) S. McCall (503 221-5880 ext 4), 5480 NW Front Ave, Portland, Oregon 97210 503 221-6400.

See Names in question #78.

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

- 74. Provide all copies of the Respondent's authority to do business in Oregon. Include all authorizations, withdrawals, suspensions and reinstatements.

See Appendix D: Tab 25 and 26

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

75. If Respondent is, or was at any time, a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity, then describe the full nature of each such corporate relationship, including but not limited to:

McCall was not affiliated with another corporation or entity. Company structure has been addressed in question 73.

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

- a. a general statement of the nature of relationship, indicating whether or not the affiliated entity had, or exercised, any degree of control over the daily operations or decision-making of the Respondent's business operations at the Site;
 - b. the dates such relationship existed;
 - c. the percentage of ownership of Respondent that is held by such other entity(ies);
 - d. for each such affiliated entity provide the names and complete addresses of its parent, subsidiary, and otherwise affiliated entities, as well as the names and addresses of each such affiliated entity's officers, directors, partners, trustees, beneficiaries, and/or shareholders owning more than five percent of that affiliated entity's stock;
 - e. provide any and all insurance policies for such affiliated entity(ies) which may possibly cover the liabilities of the Respondent at each Property; and
 - f. provide any and all corporate financial information of such affiliated entities, including but not limited to total revenue or total sales, net income, depreciation, total assets and total current assets, total liabilities and total current liabilities, net working capital (or net current assets), and net worth.
76. If Respondent is a partnership, please describe the partnership and provide a history of the partnership's existence. Provide a list of all current and past partners of any status (e.g., general, limited, etc.) and provide copies of all documents that created, govern, and otherwise rules the partnership, including any amendments or modifications to any of the originals of such documents, and at least five years of partnership meeting minutes.

The Companies described in question 73 have maintained C-Corp status up until 2001 and are currently registered as S-Corporations.

Financial and specific Insurance information has been withheld. Please read letter in Appendix: E relating to Confidential Business Information.

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

Section 9.0 Compliance With This Request

77. Describe all sources reviewed or consulted in responding to this request, including, but not limited to:

a. the name and current job title of all individuals consulted;

John Renda: Anchor Environmental

Jim Charriere: McCall Oil and Chemical

R.H. McCall: Chairman of the Board MOCC

Edmund B. McCall: Property Manager McCall Enterprises Inc.

Edgar S. McCall: Risk Manager MOCC

Ronald Brown: Operations Manager MOCC

Jeffrey Keany: Tonk and Torp attorney Portland Oregon

For further names of individuals see question number 78.

b. the location where all sources reviewed are currently reside; and

Sources and documentation are stored and located at the following locations:

McCall Oil and Chemical Terminal 5480 NW Front Ave, Portland, OR 97210,

McCall Enterprises Inc, office 219 SW Stark Street, Portland, OR 97204,

Business Records Center, 1130 NE 28th, Portland, OR 97232

c. the date consulted.

All of the above mentioned contacts have been consulted multiple times over the past 8 months.

78. If not already provided, identify and provide a last known address or phone number for all persons, including Respondent's current and former employees or agents, other than attorneys, who have knowledge or information about the generation, use, purchase, storage, disposal, placement, or other handling of hazardous materials at, or transportation of hazardous substances, waste, or materials to or from, each Property identified in response to Question 4.

GWC Front LLC: Brenntag Pacific currently leases and operates a chemical distribution center at 5700 NW Front Ave. They are in possession of all document related to this question. See their response to 104-E.

MOREC LLC, Tanker Basin LLC and McCall Oil and Chemical: At these three locations the following persons :

Ronald Brown- Operations Manager McCall Oil and Chemical, active employee

Lee Zimmerli- Risk Manager 1986-2001 McCall Oil and Chemical, retired

Patricia Turpen- Lab Manager McCall Oil and Chemical, retired (b) (6)

Scappoose OR 97056

Rick Arrowsmith- Plant Operations Management 1973-1980 (address not know)

Ray Rizosa- Plant Operations Management 1980-1983 (address not know)

Bernard Fisher- Operations Manager McCall Oil and Chemical, retired, (b) (6)

Scappoose OR, 97056 1983-1986

Gary Powell- Plant Manager McCall Oil and Chemical, not currently an employee, (b) (6) ., Veradale WA 99037) 1983-1994

Vance Stasna- Operations Supervisor ((b) (6)) . Portland OR 97229) 1983-2001

Ronald Brown- Current Plant Manager, (5480 NW Front Ave, Portland, OR 97210) 1980-2009

Edgar S. McCall- Risk Manager McCall Oil and Chemical (5480 NW Front Ave. Portland, OR 97210) 2001-2009

Robert H. McCall- Chairman of the Board, McCall Enterprises Inc, (b) (6) Portland, OR 97201

Major Spray Service- 11605 SW 35th Ave, Portland, OR 97206 Tel. 503 245-4549

Business Records Center- 1130 NE 28th, Portland, OR 97232 Tel. 503 284-4323

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

79. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If the records were destroyed, provide us with the following:

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

Documentation relating to Great Western Chemical Corporation are no longer available. On 7/3/2001 Great Western Chemical declared chapter 11. Any documentation relating to this Entity was placed under the control of the courts. GWC Front LLC, MOREC LLC, Tanker Basin LLC and McCall Oil and Chemical are controlled by the documentation retention policy mentioned below.

- a. the document retention policy between 1937 and the present;
GWC Front LLC, MOREC LLC, Tanker Basin LLC and McCall Oil and Chemical Financial Documents are stored for 7 years. Environmental: Reports are never destroyed, NPDS, city and state documents are retained for 7 years.
- b. the approximate date of destruction;
Documents are destroyed yearly. Financial documents are stored for 7 years and are then destroyed. Environmental Reports are never destroyed. City and State correspondences are stored for seven years.
- c. a description of the type of information that would have been contained in the documents;
Environmental Information: (NPDS Data, waste oils, oil water separator cleaning, city and state correspondences) Accounting Information: vendor records and invoices, bills of sale and ledgers.

- d. the name, job title and most current address known by you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; the person(s) who would have been responsible for destroying the documents; and the person(s) who had and/or still have the originals or copies of these documents; and

Ronald Brown- Operations Manager McCall Oil and Chemical, active employee

Lee Zimmerli- Risk Manager 1986-2001 McCall Oil and Chemical, retired

Patricia Turpen- Lab Manager McCall Oil and Chemical, retired (b) (6)

Scappoose OR 97056

Rick Arrowsmith- Plant Operations Management 1973-1980 (address not know)

Ray Rizosa- Plant Operations Management 1980-1983 (address not know)

Bernard Fisher- Operations Manager McCall Oil and Chemical, retired, (b) (6)

Scappoose OR, 97056 1983-1986

Gary Powell- Plant Manager McCall Oil and Chemical, not currently an employee, (b) (6), Veradale WA 99037) 1983-1994

Vance Stasna- Operations Supervisor (b) (6) Portland OR 97229) 1983-2001

Ronald Brown- Current Plant Manager, (5480 NW Front Ave, Portland, OR 97210) 1980-2009

Edgar S. McCall- Risk Manager McCall Oil and Chemical (5480 NW Front Ave. Portland, OR 97210) 2001-2009

Robert H. McCall- Chairman of the Board, McCall Enterprises Inc, ((b) (6) , Portland, OR 97201)

- e. the names and most current addresses of any person(s) who may possess documents relevant to this inquiry.

To McCall's knowledge no current and or past employee currently possess any documents relevant to this inquiry.

80. Provide a description of all records available to you that relate to all of the questions in this request, but which have not been included in your responses.

Information relating to dates of incorporation and when certain entities were dissolved dating back to 1937 was not located.

Financial and specific Insurance information has been withheld. Please read letter in Appendix: E relating to Confidential Business Information.

See answer to number 4 regarding Great Western Chemical, Newco, Quadra, and Brenntag Pacific.

INSTRUCTIONS

1. Answer Each Question Completely. Provide a separate answer to each question and subpart set forth in this Information Request. Please provide responses to all the questions in this Information Request for each Property identified in response to Question 4 of Section 2.0, when appropriate. For each Response clearly identify the Property or Properties to which the response applies. Incomplete, evasive, or ambiguous answers shall constitute failure to respond to this Information Request and may subject the Respondent to the penalties set out in the cover letter.
2. Response and Copies of Documents Must be on Paper (hard copy). Provide the responses to this Information Request and at least one copy of all requested documents on hard copy paper.

There is a Portland Harbor PRP search website:

(<http://yosemite.epa.gov/R10/CLEANUP.NSF/7d19cd587dff1eee8825685f007d56b7/75e7f27bd108f3eb88256f4a007ba018!OpenDocument>) that lists documents in the Superfund program's files related to certain facilities or parties. You do not need to provide a copy of a document that appears on the list if EPA has a complete copy. If a document is on EPA's list, you still must provide a complete Response to each question in this Information Request and, if necessary in order to completely respond to a Question, describe the content of any document in EPA's files in your Response.

You may also provide a second copy of the response electronically on a compact disc, if you choose, in Portable Document Format (PDF) format. If possible, further format large documents as follows;

- a. Bookmark documents longer than 10 pages for easier navigation (e.g., chapters);
 - b. Ensure that file/document properties/initial view is for "bookmarks panel and page" if there are bookmarks.
 - c. For document composed of multiple files, link together with a starter file that is less than 2 MB, i.e., the document's executive summary. The executive summary should have a bookmarks panel with bookmark links to the other files. Ensure that all files are saved to the same folder, rather than multiple folders so that the linkage is retained.
 - d. Bookmarks to other files should indicate the name of that file (and size of that file, if over 1 MB).
 - e. "Tag" the document for accessibility if this was not done by the source application (advanced/accessibility/tag).
 - f. Enter document properties: 1) title, author (should be XXXX for EPA Region 10), 2) subject, and 3) keywords.
3. Number Each Answer. Number each answer with the number of the question to which it corresponds.

4. Provide the Best Information Available. Provide responses to the best of Respondent's ability, even if the information sought was never put down in writing or if the written documents are no longer available. Seek out responsive information from current and former employees/agents. Submission of cursory responses when other responsive information is available to the Respondent will be considered noncompliance with this Information Request.
5. Identify Information Sources. For each question, identify all persons and documents relied upon for the answer.
6. Confidential Information. The information requested herein must be provided even though the Respondent may contend that it includes confidential information or trade secrets. The Respondent may assert a confidentiality claim covering part or all of the information requested, pursuant to 42 U.S.C. ' ' 9604(e)(7)(E) and (F), and 40 C.F.R. ' 2.203(b). All information claimed to be confidential should be contained on separate sheet(s) and should be clearly identified as "trade secret" or "proprietary" or "company confidential." A confidentiality claim should be supported by the submission of information consistent with 40 C.F.R. Part 2. Information covered by a confidentiality claim will be disclosed by EPA only to the extent, and only by means of the procedures, provided in 40 C.F.R. ' ' 2.201-2.311. If no such claim accompanies the information received by EPA, it may be made available to the public by EPA without further notice.
7. Disclosure to EPA Contractor. Information submitted in response to this Information Request may be disclosed by EPA to authorized representatives of the United States, pursuant to 40 C.F.R. 2.310(h), even if the Respondent asserts that all or part of it is confidential business information. EPA may provide this information to its contractors for the purpose of organizing and/or analyzing the information contained in the responses to this Information Request. If submitting information and asserting it is entitled to treatment as confidential business information, the Respondent may comment on EPA's intended disclosure within 14 days of receiving this Information Request.
8. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy, should be segregated from responses, included on separate sheet(s), and marked as "Personal Privacy Information". Note, however, that unless prohibited by law, EPA may disclose this information to the general public without further notice.
9. Objections. The Respondent must provide responsive information notwithstanding objections to certain questions. To object without providing responsive information may subject Respondent to the penalties set out in the cover letter.
10. Privilege. If a privilege is asserted for any document responsive to this Information Request, identify (see Definitions) the document and provide the basis for assertion. If a privilege exists for only a portion of a document, provide the portion of the document that is not asserted be privileged, identify the portion that is asserted to be privileged, and provide the basis for asserting privilege. Please note that regardless of the assertion of

any privilege, any facts contained in the document which are responsive to the Information Request must be disclosed in your response.

11. Declaration. The Respondent must complete the enclosed declaration, certifying the accuracy of all statements in your response.

DEFINITIONS

All terms not defined herein shall have their ordinary meaning, unless such terms are defined in Section 101 of CERCLA, 42 U.S.C. ' 9601, *et seq.*, or Volume 40 of the Code of Federal Regulations (CFR), in which case such statutory or regulatory definitions shall apply.

The following definitions shall apply to the following words as they appear in this Enclosure:

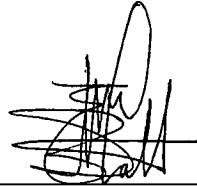
1. The term "you" or "Respondent" shall mean the addressee of this Request, together with the addressee's officers, managers, agents, employees, contractors, trustees, successors, assigns, and any predecessor or successor corporations or companies.
2. The term Abusiness activities@ shall mean all actions, endeavors, ventures, or financing arrangements related in any manner whatsoever to the use and development of the Property, including surveying, sampling, grading, documentation, photography, demolition, construction, and waste disposal, and sales.
3. The terms "document" and "documents" shall mean any method of recording, storing, or transmitting information. "Document" shall include, but not be limited to:
 - a. writings of any kind, including, but not limited to, any of the following:
 - i. letters, memoranda, email or fax transmittals;
 - ii. any film, photograph, or sound recording on any type of device;
 - iii. meeting minutes, telephone records, notebooks;
 - iv. agreements and contracts;
 - v. reports to shareholders, management, or government agencies;
 - vi. transportation manifests;
 - vii. copies of any document;
 - viii. report, notices, analysis, notebook.
 - b. any blueprints or drawings; and
 - c. attachments to, or enclosures with, any document.
4. The term "identify" means, with respect to a natural person, to set forth: (a) the person's full name, (b) present or last known business and home addresses and telephone numbers; and (c) present or last known employer (include full name and address) with job title, position, or business.
5. The term "identify" means, with respect to a corporation, partnership, business trust, or

- other entity, to set forth: (a) its full name; (b) complete street address; (c) legal form (e.g., corporation, partnership, etc.); (d) the state under whose laws the entity was organized; and (e) a brief description of its business.
6. The term "identify" means, with respect to a document, to provide: (a) its customary business description (e.g., letter, invoice); (b) its date; (c) its number if any (e.g., invoice or purchase order number); (d) the identity of the author, addressee, and/or recipient; and (e) a summary of the substance or the subject matter. Alternatively, Respondent may provide a complete copy of the document.
 7. The term "Investigation Area" refers to the area in and adjacent to the Willamette River in which EPA is currently conducting its PRP search and is bounded to the North by the confluence of the Columbia Slough, approximately River Mile 1.7 and bounded to the South at River Mile 12 and bounded to the East by a line following N Lombard St. to N Columbia Blvd. to Chimney Park to N. Commando Ave. to N Lombard St. to N Reno Ave. to N Edison St. to N Catlin Ave to N Decatur St. to N Baltimore Ave. to N Crawford St. to N Polk Ave. to N Willamette Blvd. to N Greeley Ave to N Interstate Ave. and bounded to the West by a line following NW Gillihan Rd. on Sauvie Island to Columbia River Hwy 30 to NW St. Helens Rd. to NW Nicolai St. to NW Vaughn St. to NW Thurman St. to NW 14th Ave. to NW Raleigh St. to NW 13th Ave. to NW Pettygrove St. to NW 12th Ave to NW Overton St. to NW 9th Ave. to NW Lovejoy St. to NW Broadway to NW Glisan St. Additionally, the area included between the Columbia River Hwy 30 and Forest Park is included in the definition of Investigation Area. See attached Investigation Area Map for a visual depiction of the Investigation Area.
 8. The term "material" or "materials" shall mean any and all raw materials, commercial products, wastes, oil, petroleum, chemicals, substances, or matter of any kind.
 9. The "period being investigated" and "the relevant time period" shall mean 1937 to present.
 10. The term "Property(ies)" shall refer to any and all real or personal property within the Portland Harbor Investigation Area that Respondent owns, leases, manages, operates, has an easement on, or otherwise has an affiliation, or previously owned, leased, managed, operated, had an easement on, or otherwise had an affiliation during the period being investigated. The term Property includes aquatic lands owned, leased, or otherwise controlled by Respondent. Please note that you must answer the Questions in this Information Request related to properties outside the Investigation Area if Question 4, Section 2.0 specifically instructs you to.
 11. The term "waste" or "wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid, liquid, or sludge, including, but not limited to, containers for temporary or permanent holding of wastes, building debris and asbestos-containing material.

DECLARATION

I declare under penalty of perjury that I am authorized to respond on behalf of Respondent and that the foregoing is complete, true, and correct.

Executed on Feb. 25th, 2009.



Signature

Edgar Sawyer McCall
Type or Print Name

V.P.
Title

Mailing Address: 5480 N.W. Front Ave
Portland, OR 97210